

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)
)
Broadcast Localism) MB Docket No. 04-233
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)

To: Office of the Secretary
Attn: The Commission

COMMENTS

Taconite Broadcasting, Inc., the licensee of WMQT-FM & WZAM-AM, Ishpeming Michigan, pursuant to *Report on Broadcast Localism and Notice of Proposed Rulemaking*, FCC 08-218, MB Docket No. 04-233, released January 24, 2008, hereby submits its comments in this proceeding regarding the FCC's several proposed rule changes designed to enhance broadcast localism and diversity, to increase and improve the amount and nature of broadcast programming that is targeted to the local needs and interests of a broadcast station's community of service, and to provide more accessible information to the public about broadcasters' efforts to air such programming.¹

A. COMMUNICATION BETWEEN LICENSEES AND THEIR COMMUNITIES

1. *Community Advisory Boards.* The Commission's former ascertainment requirement directed broadcasters to comply with detailed, formal procedures to determine the needs and interests of their communities, at the time that they initially sought their station authorizations, asked for approval to obtain a station, and sought license renewal. The Commission believes that new efforts are needed to ensure that licensees regularly gather information from community representatives to help inform the stations' programming decisions including regular, quarterly licensee meetings with a board of community advisors and improved access by the public to station decision makers. The Commission proposes that each licensee should convene a permanent advisory board made up of officials and other leaders from the service area of its broadcast station.

Small market radio stations like ours play a significant role in our communities. Knowing what is of need and interest to our community is critical. We are able to respond quickly because we are actively involved in it. I am involved with many civic organizations including the Chamber of Commerce, the United States Olympic Education Center and many more. My Program Director and his wife (one of our announcers) are involved in the local Historical Society, have tracked down information of World War II veterans who were lost at war from our area, raised over \$225,000 in money for the March of Dimes, collected 600+ pints of blood each year for our local blood bank and the list could go on and on. For economic survival,

small market operators must know what the needs of the community are and react to them. Every week we take calls and receive e-mail from people in the community looking for our help. They contact us because we are approachable and responsible. We care, they know it and the model works. In our small community I or my staff are on boards and meet on a regular basis enough to know what is going on or if we don't they surely know who to contact. Having a formal board would just be a duplication.

Remote Station Operation. The Commission believes that the prevalence of automated broadcast operations which allow the operation of stations without a local presence has a negative impact upon the licensees' ability to determine and serve local needs. The Commission is proposing that licensees maintain a physical presence at each radio broadcasting facility during all hours of operation.

The technology has allowed us to operate remotely for certain hours. I have staff living 2 blocks away with cell phone alarms that respond to emergencies. Our entire city was without power for the better part of a Sunday and the only radio stations on the air were ours. Within minutes, three of us were in the studios fielding calls from listeners, airing announcements from the local police department and cautioning people of the situation. Many areas of our community were without power for over 9 hours that day. We are responsible with remote operation.

NATURE AND AMOUNT OF COMMUNITY-RESPONSIVE PROGRAMMING

2. *Main Studio Rule.* The Commission concludes that licensees be required to locate their main studios within the local communities so that they are “part of the neighborhood” thus reverting to the Commission’s pre-1987 main studio rule in order to encourage broadcasters to produce locally originated programming.

When the Commission allowed the main studio rule to be within 25 miles of the community of license it enabled us to move 12 miles to a location convenient for more people to interact with us in person. Over 50% of the people who live in our city of license work in the city our studios are located in. The building we are leasing puts us in the center of the larger community we serve. Listeners who come to share an event they want us to air, local civic groups that use our conference room for their meetings and winners that pick up prizes have front door parking, **handicap accessibility (We were previously on a second floor with no elevator).** The building we are in has backup power with a generator in it so we have remained on the air during local power outages. We have given full access to the on air studios to local law enforcement to put on all the safety information that they want to pass

on. By following the rules of 25 miles within our city of license, we have determined that the best place to serve our community of license is in the location we are in.

3. *Voice-Tracking.* The Commission is seeking comment on the prevalence of voice-tracking and whether it can and should take steps to limit the practice, require disclosure, or otherwise address it, believing that such practices may diminish the presence of licensees in the communities and thus hinder their ability to assess the needs and interests of their local communities.

Voice-Tracking allows us to be more productive in what we do. Because of the ability to voice track certain hours, my announcers can be busy preparing one of 7 newscasts a day on our FM and 18 a day on our AM. They can be producing our public affairs show “The Big Question” where they interview local community groups about their upcoming events or our “15 minutes” program where local newsmakers and groups get expanded time to talk about their topics. Every weekday is a one hour local sports talk show. Because of technology we are able to multi task and pre-record certain programs for airing at a later date and time. We would argue that voice tracking can allow us to deliver a fuller product to our listeners.

In conclusion, Taconite Broadcasting, Inc. submits that the above comments should be taken into consideration by the Commission in issuing its decision in the above-referenced proceeding.

Respectfully submitted,

Taconite Broadcasting, Inc.

By Thomas P. Mogush, President

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